

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

Kal Freight Inc., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-90614 (CML)

(Jointly Administered)

**AMENDED² AGENDA FOR HEARING SCHEDULED FOR
MARCH 12, 2025 AT 10:00 A.M. (PREVAILING CENTRAL TIME)**

The above-referenced debtors and debtors in possession (collectively, the “Debtors”) file this Agenda for the hearing scheduled for March 12, 2025, at 10:00 a.m. (prevailing Central Time) (the “Hearing”) before the Honorable Christopher M. Lopez of the United States Bankruptcy Court for the Southern District of Texas:

A. MATTERS GOING FORWARD

1. *Debtors’ Emergency Motion for Entry of an Order (I) Approving Binding Settlement Term Sheet with Participating Lenders and Committee, (II) Authorizing Relief from Automatic Stay and/or Abandonment of Certain Collateral, and (III) Granting Related Relief* [Docket No. 691].

Response Deadline: On or before the hearing of March 12, 2025 at 10:00 a.m. (CT).

Responses Received:

- (a) U.S. Bank National Association d/b/a U.S. Bank Equipment Finance’s Objection to Debtors’ Emergency Motion for Entry of an Order (I) Approving Binding Settlement Term Sheet With Participating Lenders and Committee, (II) Authorizing Relief From The Automatic Stay and/or Abandonment of Certain Collateral, and (III) Granting Related Relief [Docket No. 699].
- (b) Statement of Vanguard National Trailer Corporation and CIMC Reefer Trailer, Inc. With Respect to Scheduling of Debtors' Emergency Motions to

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification numbers, are: KAL Freight Inc. (0249). KAL Aviation LLC (2600). KAL Partz Inc. (0139). KAL Trailers & Leasing Inc. (0840). and KVL Tires Inc. (0320). The location of the Debtors’ service address in these Chapter 11 cases is 10156 Live Oak Ave., Fontana, CA 92335.

² Amended items are in **bold**.

(I) Sell Certain Assets and (II) to Enter Into Binding Settlement with Participating Lenders and Committee [Docket No. 702].

- (c) Debtors' Response To Statement of Vanguard National Trailer Corporation and CIMC Reefer Trailer, Inc. With Respect to Scheduling of Debtors' Emergency Motions to (I) Sell Certain Assets and (II) Enter Into Binding Settlement With Participating Lenders and Committee [Docket No. 707].
- (d) Joinder by Webster Capital Finance, a Division of Webster Bank, N.A. (as Assignee of JPMorgan Chase Bank, N.A.) in U.S. Bank National Association d/b/a U.S. Bank Equipment Finance's Objection to Debtors' Emergency Motion for Entry of an Order (I) Approving Binding Settlement Term Sheet With Participating Lenders and Committee, (II) Authorizing Relief from the Automatic Stay and/or Abandonment of Certain Collateral, and (III) Granting Related Relief [Docket No. 724].
- (e) **Joinder of Simmons Bank to U.S. Bank National Association d/b/a U.S. Bank Equipment Finance's Objection to Debtors' Emergency Motion for Entry of an Order (I) Approving Binding Settlement Term Sheet with Participating Lenders and Committee, (II) Authorizing Relief from the Automatic Stay and/or Abandonment of Certain Collateral, and (III) Granting Related Relief [Docket No. 733].**
- (f) **Notice of PACCAR Financial Corp.'s Joinder to Debtors Emergency Motion For Entry Of An Order (1) Approving Binding Settlement Term Sheet With Participating Lenders And Committee, (II) Authorizing Relief From The Automatic Stay and/or Abandonment Of Certain Collateral, and (III) Granting Related Relief [Docket No. 739].**
- (g) **FRIND-Aerotropolis, LLC's Objection and Reservation of Rights to Debtors' Emergency Motions for Entry of Orders Authorizing (I) the Sale of Certain Assets; and (II) Entry into a Settlement Agreement Pursuant to Rule 9019 [Docket No. 742].**

Status: The matter will go forward. The Debtors have resolved the Vanguard/CIMC objection through an addendum to the settlement term sheet. The objections in items 1(a) and 1(d), (e), (f), and (g) remain unresolved. The Debtors anticipate proceeding with the amended proposed order filed at Docket No. 749.

2. *Debtors' Emergency Motion for Entry of an Order (I) Authorizing (A) the Sale of Certain Assets Free and Clear of Liens, Claims, Rights, Interests, Charges, and Encumbrances, (B) the Debtors to Enter Into and Perform Under the Purchase Agreement, and (C) the Assumption and Assignment of Certain Contracts and Unexpired Leases and (II) Granting Related Relief [Docket No. 692].*

Response Deadline: On or before the hearing of March 12, 2025 at 10:00 a.m. (CT).

Responses Received:

- (a) Statement of Vanguard National Trailer Corporation and CIMC Reefer Trailer, Inc. With Respect to Scheduling of Debtors' Emergency Motions to (I) Sell Certain Assets and (II) to Enter Into Binding Settlement with Participating Lenders and Committee [Docket No. 702].
- (b) Debtors' Response To Statement of Vanguard National Trailer Corporation and CIMC Reefer Trailer, Inc. With Respect to Scheduling of Debtors' Emergency Motions to (I) Sell Certain Assets and (II) Enter Into Binding Settlement With Participating Lenders and Committee [Docket No. 707].
- (c) **FRIND-Aerotropolis, LLC's Objection and Reservation of Rights to Debtors' Emergency Motions for Entry of Orders Authorizing (I) the Sale of Certain Assets; and (II) Entry into a Settlement Agreement Pursuant to Rule 9019 [Docket No. 742].**
- (d) **Objection by Rexford Industrial Realty, L.P., a Maryland Limited Partnership to Debtors' Emergency Motion for Entry of An Order (1) Authorizing (A) the Sale of Certain Assets Free and Clear of Liens, Claims, Rights, Interest, Charges and Encumbrances, (B) The Debtors to Enter Into and Perform Under the Purchase Agreement, and (C) the Assumption and Assignment of Certain Contracts and Unexpired Leases and (II) Granting Related Relief; Statement of Correct Cure Amount and Reservation of Rights [Docket No. 735].**
- (e) **Limited Objection of Dharminder Randhawa and Sikander Randhawa to the Debtors Emergency Motion (I) Authorizing (A) the Sale of Certain Assets Free and Clear of Liens, Claims, Rights, Interests, Charges, and Encumbrances, (B) the Debtors to Enter Into and Perform Under the Purchase Agreement, and (C) the Assumption and Assignment of Certain Contracts and Unexpired Leases and (II) Granting Related Relief [Docket No. 746].**

Status: The matter will go forward. The Debtors have resolved the Vanguard/CIMC objection. Items 2(c) and 2(d) remain pending. The Debtors anticipate proceeding with the amended proposed order filed at Docket No. 752.

Financing Motions

- 3. *Debtors' Emergency Motion For Entry of Interim and Final Authorizing Debtors to (I) Maintain and Continue to Operate Under Factoring and Security Agreement in Order to Sell Accounts Post-Petition to Triumph Pursuant to 11 U.S.C. Section 363(b), (c), (f), and (m). (II) Obtain Credit From Triumph Pursuant to 11 U.S.C. Sections 364(c)(1), (c)(2), and (d)(1). (III) Grant Adequate Protection in the Form of First Priority Liens and Security Interests on Property of Debtors Estates Pursuant to 11 U.S.C. Sections 361 and 363(e). (IV) Amend the Factoring and Security Agreement and Grant Triumph Business Capital Additional Liens. (V) Authorize the Debtors to Use Cash Collateral and Grant Triumph Adequate Protection. (VI) Annul*

and Modify the Automatic Stay. and (VII) Grant Related Relief all Retroactively to the Petition Date [Docket No. 7].

Response Deadline: January 3, 2025 at 4:00 p.m. (CT). The response deadline was extended to January 6, 2025 for Flushing Bank, and through the date of any final hearing set by the Court for Chubb. The deadline for the Committee to respond has been extended by agreement between the Debtors, the Committee, and the applicable lenders.

Responses Received:

- (a) Limited Objection and Reservation of Rights of Fifth Third Bank, N.A., Mitsubishi HC Capital Canada, Inc., and Truist Equipment Corp. to the Debtors' Financing Motions [Docket No. 290].
- (b) Mode Transportation, LLC's Response, Objection and Reservation of Rights to the Adequate Protection Motions Filed by the Debtors and Certain Creditors of the Debtors in These Chapter 11 Cases [Docket No. 291].
- (c) Omnibus Objection of Vanguard National Trailer Corporation and CIMC Reefer Trailer, Inc. to the Debtors' Financing Motions [Docket No. 292].
- (d) Premier Trailers, LLC'S Response, Objection, and Reservation of Rights to the Adequate Protection Motions filed by the Debtors and Certain Creditors of the Debtors in These Chapter 11 Cases [Docket No. 346].
- (e) Omnibus Objection of the Official Committee of Unsecured Creditors to Motions Scheduled for March 4, 2025 Hearing and Emergency Cross-Motion for Order Converting Cases to Chapter 7 [Docket No. 582].
- (f) Omnibus Objection of the Official Committee of Unsecured Creditors to Motions Scheduled for March 4, 2025 Hearing and Emergency Cross-Motion for Order Converting Cases to Chapter 7 [Docket No. 583].
- (g) **Banc of America Leasing & Capital, LLC's Statement Regarding Conversion; the Lifting the Automatic Stay [Docket No. 612].**

Status: The matter will go forward. **The Debtors anticipate proceeding with the amended proposed order filed at Docket No. 750, which incorporates the terms of the settlement term sheet. The Debtors are not aware if any party intends to assert an objection to the revised order.**

4. *Debtors' Emergency Motion for Entry of Interim and Final Orders (A) Providing Adequate Protection to Daimler Truck Financial Services USA Inc, (B) Modifying the Automatic Stay, (C) Scheduling a Final Hearing, and (D) Granting Related Relief [Docket No. 8].*

Response Deadline: January 3, 2025 at 4:00 p.m. (CT). The response deadline was extended to January 6, 2025 for Flushing Bank, and through the date of any final hearing set by the Court for Chubb. The deadline for the Committee to respond has

been extended by agreement between the Debtors, the Committee, and the applicable lenders.

Responses Received:

- (a) Daimler's Joinder to Debtors' Emergency Motion for Entry of Interim and Final Orders (A) Providing Adequate Protection to Daimler Truck Financial Services USA Inc, (B) Modifying the Automatic Stay, (C) Scheduling a Final Hearing, and (D) Granting Related Relief [Docket No. 96].
- (b) Limited Objection of Wells Fargo Equipment Finance, Inc. and Wells Fargo Bank, N.A. to Emergency Adequate Protection Motions [Docket Nos. 265 & 266].
- (c) Limited Objection of Atlantic Union Equipment Finance, Inc. to (I) Emergency Cash Collateral Motion and (II) Adequate Protection Motions [Docket No. 288].
- (d) PACCAR's Limited Objection to Debtors' Emergency Motion for Entry of Interim and Final Orders (A) Providing Adequate Protection to Daimler Truck Financial Services USA Inc, (B) Modifying the Automatic Stay, (C) Scheduling a Final Hearing, and (D) Granting Related Relief. Debtors' Emergency Motion for Entry of Interim and Final Orders (A) Providing Adequate Protection to Banc Of America Leasing & Capital, LLC, (B) Modifying the Automatic Stay, (C) Scheduling a Final Hearing, and (D) Granting Related Relief. Interim Order (A) Providing Adequate Protection to Daimler Truck Financial Services USA Inc, (B) Modifying the Automatic Stay, (C) Scheduling a Final Hearing, and (D) Granting Related Relief. and Interim Order (A) Providing Adequate Protection to Banc of America Leasing & Capital, LLC, (B) Modifying the Automatic Stay, (C) Scheduling a Final Hearing, and (D) Granting Related Relief [Docket No. 289].
- (e) Limited Objection and Reservation of Rights of Fifth Third Bank, N.A., Mitsubishi HC Capital Canada, Inc., and Truist Equipment Corp. to the Debtors' Financing Motions [Docket No. 290].
- (f) Mode Transportation, LLC's Response, Objection and Reservation of Rights to the Adequate Protection Motions Filed by the Debtors and Certain Creditors of the Debtors in These Chapter 11 Cases [Docket No. 291].
- (g) Omnibus Objection of Vanguard National Trailer Corporation and CIMC Reefer Trailer, Inc. to the Debtors' Financing Motions [Docket No. 292].
- (h) Joinder of Simmons Bank to (A) Limited Objection of Wells Fargo Equipment Finance, Inc. and Wells Fargo Bank, N.A. to Emergency Adequate Protection Motions and (B) Limited Objection of Atlantic Union Equipment Finance, Inc. to (I) Emergency Cash Collateral Motion and (II) Adequate Protection Motions [Docket No. 297].

- (i) Flushing Bank's Limited Objection to Entry of Final Orders on Debtors' Emergency Motions for Orders (A) Providing Adequate Protection to TBK Bank, SSB, Daimler Truck Financial Services USA, Inc. and Banc of America Leasing & Capital, LLC (B) Modifying the Automatic Stay, (C) Scheduling Final Hearing and (D) Granting Related Relief [Docket No. 308].
- (j) Premier Trailers, LLC'S Response, Objection, and Reservation of Rights to the Adequate Protection Motions filed by the Debtors and Certain Creditors of the Debtors in These Chapter 11 Cases [Docket No. 346].
- (k) Omnibus Objection of the Official Committee of Unsecured Creditors to Motions Scheduled for March 4, 2025 Hearing and Emergency Cross-Motion for Order Converting Cases to Chapter 7 [Docket No. 582].

Status: The matter will go forward. **The Debtors anticipate proceeding with the amended proposed order filed at Docket No. 749, which incorporates the terms of the settlement term sheet. The Debtors are not aware if any party intends to assert an objection to the revised order.**

5. *Debtors' Emergency Motion for Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, (B) Providing Adequate Protection, (C) Modifying the Automatic Stay, and (D) Scheduling a Final Hearing [Docket No. 19].*

Response Deadline: January 3, 2025 at 4:00 p.m. (CT). The response deadline was extended to January 6, 2025 for Flushing Bank, and through the date of any final hearing set by the Court for Chubb. The deadline for the Committee to respond has been extended by agreement between the Debtors, the Committee, and the applicable lenders.

Responses Received:

- (a) Limited Objection of Wells Fargo Equipment Finance, Inc. and Wells Fargo Bank, N.A. to Emergency Adequate Protection Motions [Docket Nos. 265 & 266]
- (b) Limited Objection of Atlantic Union Equipment Finance, Inc. to (I) Emergency Cash Collateral Motion and (II) Adequate Protection Motions [Docket No. 288].
- (c) Limited Objection and Reservation of Rights of Fifth Third Bank, N.A., Mitsubishi HC Capital Canada, Inc., and Truist Equipment Corp. to the Debtors' Financing Motions [Docket No. 290].
- (d) Mode Transportation, LLC's Response, Objection and Reservation of Rights to the Adequate Protection Motions Filed by the Debtors and Certain Creditors of the Debtors in These Chapter 11 Cases [Docket No. 291].
- (e) Omnibus Objection of Vanguard National Trailer Corporation and CIMC Reefer Trailer, Inc. to the Debtors' Financing Motions [Docket No. 292].

- (f) Joint Objection of the Texas Taxing Authorities to the Debtors' Emergency Motion for Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, (B) Providing Adequate Protection, (C) Modifying the Automatic Stay, and (D) Scheduling a Final Hearing [Docket No. 296].
- (g) Joinder of Simmons Bank to (A) Limited Objection of Wells Fargo Equipment Finance, Inc. and Wells Fargo Bank, N.A. to Emergency Adequate Protection Motions and (B) Limited Objection of Atlantic Union Equipment Finance, Inc. to (I) Emergency Cash Collateral Motion and (II) Adequate Protection Motions [Docket No. 297].
- (h) FRIND-Aerotropolis, LLC's Limited Objection and Reservation of Rights to Debtors' Emergency Motion for Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, (B) Providing Adequate Protection, (C) Modifying the Automatic Stay, and (D) Scheduling a Final Hearing [Docket No. 301].
- (i) Flushing Bank's Limited Objection to Entry of Final Orders on Debtors' Emergency Motions for Orders (A) Providing Adequate Protection to TBK Bank, SSB, Daimler Truck Financial Services USA, Inc. and Banc of America Leasing & Capital, LLC (B) Modifying the Automatic Stay, (C) Scheduling Final Hearing and (D) Granting Related Relief [Docket No. 308].
- (j) Limited Objection and Reservation of Rights of Pioneer Properties and Ferrelle A. Wetzel, LLC to Debtors' Emergency Motion for Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, (B) Providing Adequate Protection, (C) Modifying the Automatic Stay, and (D) Scheduling a Final Hearing [Docket No. 323].
- (k) Premier Trailers, LLC'S Response, Objection, and Reservation of Rights to the Adequate Protection Motions filed by the Debtors and Certain Creditors of the Debtors in These Chapter 11 Cases [Docket No. 346].
- (l) Omnibus Objection of the Official Committee of Unsecured Creditors to Motions Scheduled for March 4, 2025 Hearing and *Emergency* Cross-Motion for Order Converting Cases to Chapter 7 [Docket No. 582].

Status: The matter will go forward. **The Debtors anticipate proceeding with the amended proposed order filed at Docket No. 751, which incorporates the terms of the settlement term sheet. The Debtors are not aware if any party intends to assert an objection to the revised order.**

6. *Debtors' Emergency Motion for Entry of Interim and Final Orders (A) Providing Adequate Protection to Banc of America Leasing & Capital, LLC, (B) Modifying the Automatic Stay, (C) Scheduling a Final Hearing, and (D) Granting Related Relief* [Docket No. 183].

Response Deadline: January 3, 2025 at 4:00 p.m. (CT). The response deadline was extended to January 6, 2025 for Flushing Bank. The deadline for the Committee to

respond has been extended by agreement between the Debtors, the Committee, and the applicable lenders.

Responses Received:

- (a) Limited Objection of Vanguard National Trailer Corporation and CIMC Reefer Trailer, Inc. to Debtors' Emergency Motion for Entry of Interim And Final Orders (A) Providing Adequate Protection To Banc Of America Leasing & Capital, LLC, (B) Modifying The Automatic Stay, (C) Scheduling A Final Hearing, And (D) Granting Related Relief [Docket No. 198].
- (b) Limited Objection of Wells Fargo Equipment Finance, Inc. and Wells Fargo Bank, N.A. to Emergency Adequate Protection Motions [Docket Nos. 265 & 266].
- (c) Limited Objection of Atlantic Union Equipment Finance, Inc. to (I) Emergency Cash Collateral Motion and (II) Adequate Protection Motions [Docket No. 288]. PACCAR's Limited Objection to Debtors' Emergency Motion for Entry of Interim and Final Orders (A) Providing Adequate Protection to Daimler Truck Financial Services USA Inc, (B) Modifying the Automatic Stay, (C) Scheduling a Final Hearing, and (D) Granting Related Relief. Debtors' Emergency Motion for Entry of Interim and Final Orders (A) Providing Adequate Protection to Banc Of America Leasing & Capital, LLC, (B) Modifying the Automatic Stay, (C) Scheduling a Final Hearing, and (D) Granting Related Relief. Interim Order (A) Providing Adequate Protection to Daimler Truck Financial Services USA Inc, (B) Modifying the Automatic Stay, (C) Scheduling a Final Hearing, and (D) Granting Related Relief. and Interim Order (A) Providing Adequate Protection to Banc of America Leasing & Capital, LLC, (B) Modifying the Automatic Stay, (C) Scheduling a Final Hearing, and (D) Granting Related Relief [Docket No. 289].
- (d) Mode Transportation, LLC's Response, Objection and Reservation of Rights to the Adequate Protection Motions Filed by the Debtors and Certain Creditors of the Debtors in These Chapter 11 Cases [Docket No. 291].
- (e) Omnibus Objection of Vanguard National Trailer Corporation and CIMC Reefer Trailer, Inc. to the Debtors' Financing Motions [Docket No. 292].
- (f) Joinder of Simmons Bank to (A) Limited Objection of Wells Fargo Equipment Finance, Inc. and Wells Fargo Bank, N.A. to Emergency Adequate Protection Motions and (B) Limited Objection of Atlantic Union Equipment Finance, Inc. to (I) Emergency Cash Collateral Motion and (II) Adequate Protection Motions [Docket No. 297].
- (g) Flushing Bank's Limited Objection to Entry of Final Orders on Debtors' Emergency Motions for Orders (A) Providing Adequate Protection to TBK Bank, SSB, Daimler Truck Financial Services USA, Inc. and Banc of America Leasing & Capital, LLC (B) Modifying the Automatic Stay, (C)

Scheduling Final Hearing and (D) Granting Related Relief [Docket No. 308].

- (h) Premier Trailers, LLC'S Response, Objection, and Reservation of Rights to the Adequate Protection Motions filed by the Debtors and Certain Creditors of the Debtors in These Chapter 11 Cases [Docket No. 346].
- (i) Omnibus Objection of the Official Committee of Unsecured Creditors to Motions Scheduled for March 4, 2025 Hearing and Emergency Cross-Motion for Order Converting Cases to Chapter 7 [Docket No. 582].

Status: The matter will go forward. **The Debtors anticipate proceeding with the amended proposed order filed at Docket No. 748, which incorporates the terms of the settlement term sheet. The Debtors are not aware if any party intends to assert an objection to the revised order.**

Stay Relief Motions

- 7. *Movant Nicholas Conner's Motion for Relief from Automatic Stay Under 11 U.S.C. § 362(d)* [Docket No. 163].

Response Deadline: January 14, 2025.

Responses Received:

- (a) Debtors' Objection to Movant Nicholas Conner's Motion for Relief from Automatic Stay Under 11 U.S.C. § 362(d) [Docket No. 339].
- (b) Debtors' Omnibus Objection to Motions for Relief from Stay [Docket No. 649].

Status: The matter will go forward if the Movant so desires.

- 8. *PACCAR Financial Corp.'s Motion for Relief from Automatic Stay Regarding Vehicles, or in the Alternative, Motion for Adequate Protection* [Docket No. 332].

Response Deadline: January 28, 2025.

Responses Received:

- (a) Limited Objection and Reservation of Rights of the Official Committee of Unsecured Creditors to PACCAR Financial Corp.'s Motion for Relief from Automatic Stay Regarding Vehicles, or in the Alternative, Motion for Adequate Protection [Docket No. 424].
- (b) Debtors' Objection to PACCAR Financial Corp.'s Motion for Relief from Automatic Stay Regarding Vehicles, or in the Alternative, Motion for Adequate Protection [Docket No. 445].
- (c) Debtors' Omnibus Objection to Motions for Relief from Stay [Docket No. 649].

- (d) Omnibus Objection and Reservation of Rights of the Official Unsecured Creditors' Committee to Motions for Relief from the Automatic Stay [Docket No. 666].

Status: The matter will go forward. **The Debtors have filed an amended proposed omnibus stay relief order at Docket No. 754 to address the stay relief motions of secured lenders who are not participating in the proposed settlement.**

- 9. *Atlantic Union Equipment Finance, Inc.'s Motion for Relief from the Automatic Stay* [Docket No. 337].

Response Deadline: March 4, 2025.

Responses Received:

- (a) Debtors' Omnibus Objection to Motions for Relief from Stay [Docket No. 649].
- (b) Omnibus Objection and Reservation of Rights of the Official Unsecured Creditors' Committee to Motions for Relief from the Automatic Stay [Docket No. 666].

Status: The matter will go forward. **The Debtors have filed an amended proposed omnibus stay relief order at Docket No. 754 to address the stay relief motions of secured lenders who are not participating in the proposed global settlement.**

- 10. *Motion of De Lage Landen Financial LLC for an Order Granting (I) Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) and (II) Related Relief* [Docket No. 338].

Response Deadline: March 4, 2035.

Responses Received:

- (a) Debtors' Omnibus Objection to Motions for Relief from Stay [Docket No. 649].
- (b) Omnibus Objection and Reservation of Rights of the Official Unsecured Creditors' Committee to Motions for Relief from the Automatic Stay [Docket No. 666].
- (c) Reply of De Lage Landen Financial Services, Inc., Fifth Third Bank, N.A., and Truist Equipment Finance Corp. in Support of Motions for an Order Granting (I) Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) and (II) Related Relief [Docket No. 718].

Status: The matter will go forward. **The Debtors have filed a proposed omnibus stay relief order at Docket No. 754 which resolves this matter.**

11. *Motion of Fifth Third Bank, N.A. for an Order Granting (I) Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) and (II) Related Relief* [Docket No. 354].

Response Deadline: March 4, 2025.

Responses Received:

- (a) Debtors' Omnibus Objection to Motions for Relief from Stay [Docket No. 649].
- (b) Omnibus Objection and Reservation of Rights of the Official Unsecured Creditors' Committee to Motions for Relief from the Automatic Stay [Docket No. 666].
- (c) Reply of De Lage Landen Financial Services, Inc., Fifth Third Bank, N.A., and Truist Equipment Finance Corp. in Support of Motions for an Order Granting (I) Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) and (II) Related Relief [Docket No. 718].

Status: The matter will go forward. **The Debtors have filed a proposed omnibus stay relief order at Docket No. 754 which resolves this matter.**

12. *Motion of Truist Equipment Corp. for an Order Granting (I) Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) and (II) Related Relief* [Docket No. 355].

Response Deadline: March 4, 2025.

Responses Received:

- (a) Debtors' Omnibus Objection to Motions for Relief from Stay [Docket No. 649].
- (b) Omnibus Objection and Reservation of Rights of the Official Unsecured Creditors' Committee to Motions for Relief from the Automatic Stay [Docket No. 666].
- (c) Reply of De Lage Landen Financial Services, Inc., Fifth Third Bank, N.A., and Truist Equipment Finance Corp. in Support of Motions for an Order Granting (I) Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) and (II) Related Relief [Docket No. 718].

Status: The matter will go forward **The Debtors have filed a proposed omnibus stay relief order at Docket No. 754 which resolves this matter.**

13. *U.S. Bank National Association d/b/a U.S. Bank Equipment Finance Motion for Relief from the Automatic Stay Under 11 U.S.C. § 362(d)* [Docket No. 372].

Response Deadline: March 4, 2025.

Responses Received:

- (a) Debtors' Omnibus Objection to Motions for Relief from Stay [Docket No. 649].
- (b) Omnibus Objection and Reservation of Rights of the Official Unsecured Creditors' Committee to Motions for Relief from the Automatic Stay [Docket No. 666].

Status: The matter will go forward. **The Debtors have filed an amended proposed omnibus stay relief order at Docket No. 754 to address the stay relief motions of secured lenders who are not participating in the proposed global settlement.**

14. *Simmons Bank's Motion for Relief from Automatic Stay or, in the Alternative, Adequate protection* [Docket No. 389].

Response Deadline: March 4, 2025.

Responses Received:

- (a) Debtors' Omnibus Objection to Motions for Relief from Stay [Docket No. 649].
- (b) Omnibus Objection and Reservation of Rights of the Official Unsecured Creditors' Committee to Motions for Relief from the Automatic Stay [Docket No. 666].

Status: The matter will go forward. **The Debtors have filed an amended proposed omnibus stay relief order at Docket No. 754 to address the stay relief motions of secured lenders who are not participating in the proposed global settlement.**

15. *Motion for Entry of Stipulated Order (A) Providing Adequate Protection to Webster Capital Finance, a Division of Webster Bank, N.A. (as Assignee of JPMorgan Chase Bank, N.A.), (B) Modifying the Automatic Stay, and (C) Granting Related Relief. or, in the Alternative, to Lift the Automatic Stay for Cause Pursuant to 11 U.S.C. § 362(d)(1)* [Docket No. 393].

Response Deadline: February 17, 2025.

Responses Received:

- (a) Debtors' Omnibus Objection to Motions for Relief from Stay [Docket No. 649].
- (b) Omnibus Objection and Reservation of Rights of the Official Unsecured Creditors' Committee to Motions for Relief from the Automatic Stay [Docket No. 666].

Status: The matter will go forward. **The Debtors have filed an amended proposed omnibus stay relief order at Docket No. 754 to address the stay relief motions of secured lenders who are not participating in the proposed global settlement.**

16. *Emergency Motion for an Order Granting Daimler Truck Financial Services USA LLC Relief from the Automatic Stay and Related Relief* [Docket No. 411].

Response Deadline: March 12, 2025.

Responses Received:

- (a) Limited Objection of Vanguard National Trailer Corporation and CIMC Reefer Trailer, Inc. to Emergency Motion for an Order Granting Daimler Truck Financial Services USA LLC Relief from the Automatic Stay and Related Relief [Docket No. 479].
- (b) Debtors' Omnibus Objection to Motions for Relief from Stay [Docket No. 649].
- (c) Omnibus Objection and Reservation of Rights of the Official Unsecured Creditors' Committee to Motions for Relief from the Automatic Stay [Docket No. 666].

Status: The matter will go forward. **The matter is being resolved through the amended proposed settlement order filed at Docket No. 747.**

17. *Motion of Wallwork Financial Corporation for Entry of a Stipulated Order (A) Approving Adequate Protection to Wallwork Financial Corporation and Granting Related Relief or, in the Alternative, (B) Granting Relief from the Automatic Stay* [Docket No. 436].

Response Deadline: March 4, 2025.

Responses Received:

- (a) Debtors' Omnibus Objection to Motions for Relief from Stay [Docket No. 649].
- (b) Omnibus Objection and Reservation of Rights of the Official Unsecured Creditors' Committee to Motions for Relief from the Automatic Stay [Docket No. 666].

Status: The matter will go forward. **The Debtors have filed a proposed omnibus stay relief order at Docket No. 754 which resolves this matter.**

18. *Motion to Approve Stipulated Order (A) Providing Adequate Protection to M&T Capital and Leasing Corporation, (B) Modifying the Automatic Stay, and (C) Granting Related Relief* [Docket No. 440].

Response Deadline: February 20, 2025.

Responses Received:

- (a) Omnibus Objection and Reservation of Rights of the Official Unsecured Creditors' Committee to Motions for Relief from the Automatic Stay [Docket No. 666].

Status: The matter will go forward. **The Debtors have filed an amended proposed omnibus stay relief order at Docket No. 754 to address the stay relief motions of secured lenders who are not participating in the proposed global settlement.**

- 19. *Motion for Relief from the Automatic Stay to Allow TBK Bank, SSB to Exercise its Rights and Remedies with Respect to (A) Equipment Collateral and (B) Real Property Collateral* [Docket No. 523].

Response Deadline: March 4, 2025.

Responses Received:

- (a) Debtors' Omnibus Objection to Motions for Relief from Stay [Docket No. 649].
- (b) Omnibus Objection and Reservation of Rights of the Official Unsecured Creditors' Committee to Motions for Relief from the Automatic Stay [Docket No. 666].

Status: The matter will go forward. **The matter is being resolved through the amended proposed settlement order filed at Docket No. 754.**

- 20. *Emergency Joint Motion of Wells Fargo Equipment Finance, Inc. and Wells Fargo Bank, N.A. for Relief from the Automatic Stay* [Docket No. 576].

Response Deadline: March 18, 2025.

Responses Received: None as of the filing of this Agenda.

Status: The matter will go forward. **The matter is being resolved through the amended proposed settlement order filed at Docket No. 754.**

- 21. *Premier Trailers, LLC's Motion to Compel Assumption or Rejection of Equipment Leases Under 11 U.S.C. § 365, or in the Alternative, for Relief from Stay* [Docket No. 577].

Response Deadline: March 18, 2025.

Responses Received:

- (a) Debtors' Omnibus Objection to Motions for Relief from Stay [Docket No. 649].

- (b) Omnibus Objection and Reservation of Rights of the Official Unsecured Creditors' Committee to Motions for Relief from the Automatic Stay [Docket No. 666].

Status: The matter will go forward. The Debtors have sought to assume and assign the Premier lease agreement as part of the Debtors' proposed sale motion, which should resolve Premier's motion.

- 22. *Emergency Motion for Setting and Request for Expedited Hearing on Paccar Financial Corp.'s Motion for Relief from Automatic Stay Regarding Vehicles, or in the Alternative, Motion for Adequate Protection* [Docket No. 580].

Response Deadline: March 4, 2025 at 1:00 pm CT.

Responses Received:

- (a) Debtors' Omnibus Objection to Motions for Relief from Stay [Docket No. 649].
- (b) Omnibus Objection and Reservation of Rights of the Official Unsecured Creditors' Committee to Motions for Relief from the Automatic Stay [Docket No. 666].

Status: The matter will go forward. **The Debtors have filed an amended proposed omnibus stay relief order at Docket No. 754 to address the stay relief motions of secured lenders who are not participating in the proposed global settlement.**

- 23. *Emergency Motion for Setting and Request for Expedited Hearing on Motion for Entry of a Stipulated Order (A) Providing Adequate Protection to Wallwork Financial Corporation and Granting Related Relief or, in the Alternative, (B) Granting Relief From The Automatic Stay* [Docket No. 589].

Response Deadline: March 4, 2025 at 1:00 p.m. CT.

Responses Received:

- (a) Debtors' Omnibus Objection to Motions for Relief from Stay [Docket No. 649].
- (b) Omnibus Objection and Reservation of Rights of the Official Unsecured Creditors' Committee to Motions for Relief from the Automatic Stay [Docket No. 666].

Status: The matter will go forward. **The Debtors have filed a proposed omnibus stay relief order at Docket No. 754 which resolves this matter.**

- 24. *First Western's Motion for Relief from the Automatic Stay* [Docket No. 595].

Response Deadline: March 18, 2025.

Responses Received:

- (a) Debtors' Omnibus Objection to Motions for Relief from Stay [Docket No. 649].
- (b) Omnibus Objection and Reservation of Rights of the Official Unsecured Creditors' Committee to Motions for Relief from the Automatic Stay [Docket No. 666].

Status: The matter will go forward if the Movant so desires.

Combined Plan & Disclosure Statement

25. *Emergency Motion Debtors' Emergency Motion for Entry of an Order (I) Granting Interim Approval of the Adequacy of Disclosures in the Combined Disclosure Statement and Plan. (II) Scheduling a Combined Confirmation Hearing and Setting Deadlines Related Thereto. (III) Approving Solicitation Packages and Procedures. (IV) Approving the Forms of Ballots. and (V) Granting Related Relief* [Docket No. 584].

Response Deadline: On or before the hearing of March 4, 2025 at 1:00 p.m. (CT).

Responses Received:

- (a) Objection of Mitsubishi HC Capital Canada Inc., Truist Equipment Finance Corp., and Fifth Third Bank, N.A. to the Combined Disclosure Statement and Plan of Liquidation of Kal Freight Inc. and its Affiliated Debtors Under Chapter 11 of the Bankruptcy Code [Docket No. 574].
- (b) Preliminary Objection of Vanguard National Trailer Corporation and CIMC Reefer Trailer, Inc. to the Combined Disclosure Statement and Plan of Liquidation of Kal Freight Inc. and its Affiliated Debtors under Chapter 11 of the Bankruptcy Code [Docket No. 578].
- (c) New Hope Venture, LLC's Joinder to Preliminary Objection of Vanguard National Trailer Corporation and CIMC Reefer Trailer, Inc. to the Combined Disclosure Statement and Plan of Liquidation of Debtors Under Chapter 11 of the Bankruptcy Code [Docket No. 590].
- (d) Joinder of Triumph Commercial Finance, LLC and TBK Bank, SSB to Objections to the Combined Disclosure Statement and Plan of Liquidation of Kal Freight Inc. and Its Affiliated Debtors Under Chapter 11 of the Bankruptcy Code [Docket No. 591].
- (e) MODE Transportation, LLC's Objection to the Debtors' Combined Disclosure Statement and Plan of Liquidation of Kal Freight Inc. and its Affiliated Debtors under Chapter 11 of the Bankruptcy Code [Docket No. 603].
- (f) Objection of Vanguard National Trailer Corporation and CIMC Reefer Trailer, Inc. to Debtors' Emergency Motion for Entry of an Order (I)

Granting Interim Approval of the Adequacy of Disclosures in the Combined Disclosure Statement and Plan. (II) Scheduling a Combined Confirmation Hearing and Setting Deadlines Related Thereto. (III) Approving Solicitation Packages and Procedures. (IV) Approving the Forms of Ballots. and (V) Granting Related Relief [Docket No. 610].

- (g) Joinder of Mitsubishi HC Capital Canada, Inc., Truist Equipment Finance Corporation, and Fifth Third Bank, N.A. to Objection to the Debtors' Emergency Motion for Entry of an Order (I) Granting Interim Approval of the Adequacy of Disclosures in the Combined Disclosure Statement and Plan (II) Scheduling a Combined Confirmation Hearing and Setting Deadlines Related Thereto. (III) Approving Solicitation Packages and Procedures. (IV) Approving the Form of Ballots. and (V) Granting Related Relief [Docket No. 623].

Status: The matter will go forward. **The Debtors have resolved the items in 25(b), (d), (f), and will be proceeding with the amended proposed order filed at Docket No. 745. The items at 25(a), (c), (e) and (g) are going forward if the objecting parties so desire. .**

Conversion Motions

- 26. *Emergency Motion of Vanguard National Trailer Corporation and CIMC Reefer Trailer, Inc. to Convert These Cases to Cases Under Chapter 7, or in the Alternative, Appoint a Chapter 11 Trustee* [Docket No. 569].

Response Deadline: March 4, 2025 at 1:00 pm CT.

Responses Received:

- (a) Joinder of Mitsubishi HC Capital Canada, Inc., Truist Equipment Finance Corporation, and Fifth Third Bank, N.A. to Motions to Convert the Bankruptcy Cases to Chapter 7 [Docket No. 605].
- (b) Flushing Bank's Joinder to Emergency Motions of (A) Vanguard National Trailer Corporation and CIMC Reefer Trailer, Inc. and (B) Official Committee of Unsecured Creditors to Convert These Cases to Cases Under Chapter 7 [Docket No. 619],
- (c) TBK, Triumph and Daimler Joint Response to Conversion Motions [Docket No. 622].

Status: **The matter is being resolved through the amended proposed settlement order filed at Docket No. 749.**

- 27. *Omnibus Objection of the Official Unsecured Creditors' Committee to Motions Scheduled for March 4, 2025 Hearing and Emergency Cross-Motion for Order Converting Cases to Chapter 7* [Docket Nos. 582, 583].

Response Deadline: March 4, 2025 at 1:00 pm CT.

Responses Received:

- (a) Joinder of Mitsubishi HC Capital Canada, Inc., Truist Equipment Finance Corporation, and Fifth Third Bank, N.A. to Motions to Convert the Bankruptcy Cases to Chapter 7 [Docket No. 605].
- (b) Flushing Bank's Joinder to Emergency Motions of (A) Vanguard National Trailer Corporation and CIMC Reefer Trailer, Inc. and (B) Official Committee of Unsecured Creditors to Convert These Cases to Cases Under Chapter 7 [Docket No. 619],
- (c) TBK, Triumph and Daimler Joint Response to Conversion Motions [Docket No. 622].

Status: The matter is being resolved through the amended proposed settlement order filed at Docket No. 749.

28. *Emergency Motion of the United States Trustee to Convert Cases to Chapter 7* [Docket No. 606].

Response Deadline: March 4, 2025 at 1:00 pm CT.

Responses Received:

- (a) TBK, Triumph and Daimler Joint Response to Conversion Motions [Docket No. 622].
- (b) **Debtors' Objection to Emergency Motion of the United States Trustee to Convert Cases to Chapter 7 [Docket No. 753].**

Status: The matter will go forward.

B. RELATED DOCUMENTS

- 1. [Signed] Interim Order (A) Authorizing the Use of Cash Collateral, (B) Providing Adequate Protection, (C) Modifying the Automatic Stay, and (D) Scheduling a Final Hearing [Docket No. 51].
- 2. [Signed] Interim Order (A) Providing Adequate Protection to Daimler Truck Financial Services USA Inc, (B) Modifying the Automatic Stay, (C) Scheduling a Final Hearing, and (D) Granting Related Relief [Docket No. 52].
- 3. [Signed] Interim Order Authorizing Debtors to (I) Maintain and Continue to Operate Under Factoring and Security Agreement in Order to Sell Accounts Post-Petition to Triumph Pursuant to 11 U.S.C. Section 363(b), (c), (f), and (m). (II) Obtain Credit From Triumph Pursuant to 11 U.S.C. Sections 364(c)(1), (c)(2), and (d)(1). (III) Grant Adequate Protection in the Form of First Priority Liens and Security Interests on Property of Debtors Estates Pursuant to 11 U.S.C. Sections 361 and 363(e). (IV) Amend the Factoring and Security Agreement and Grant Triumph Business Capital Additional Liens. (V) Authorize the Debtors to Use Cash Collateral and Grant

Triumph Adequate Protection. (VI) Annul and Modify the Automatic Stay. and (VII) Grant Related Relief all Retroactively to the Petition Date [Docket No. 61].

4. [Signed] Interim Order (A) Providing Adequate Protection to Banc of America Leasing & Capital, LLC, (B) Modifying the Automatic Stay, (C) Scheduling a Final Hearing, and (D) Granting Related Relief [Docket No. 219].
5. [Signed] Notice of (1) Entry of Interim Order, and (2) Final Hearing Regarding: Debtors' Emergency Motion for Entry of Interim and Final Orders (A) Providing Adequate Protection to Banc of America Leasing & Capital, LLC, (B) Modifying the Automatic Stay, (C) Scheduling a Final Hearing, and (D) Granting Related Relief [Docket No. 223].
6. Notice of Filing Supplement to Atlantic Union Equipment Finance, Inc.'s Motion for Relief from the Automatic Stay [Docket No. 391].
7. Stipulation and Order for Interim Relief from the Automatic Stay for Daimler Truck Financial Services USA LLC [Docket No. 432].
8. Declaration of Kornelija Marinkovic-Shiver in Support of Emergency Motion for an Order Granting Daimler Truck Financial Services USA LLC Relief from the Automatic Stay and Related Relief [Docket No. 438].
9. Supplemental Declaration of Kornelija Marinkovic-Shiver in Support of Emergency Motion for an Order Granting Daimler Truck Financial Services USA LLC Relief from the Automatic Stay and Related Relief [Docket No. 485].
10. Second Stipulation and Order for Interim Relief from the Automatic Stay for Daimler Truck Financial Services USA LLC [Docket No. 540].
11. U.S. Bank National Association d/b/a U.S. Bank Equipment Finance's Notice of Intent to Adduce Testimony from a Remote Location by Telephone and Video Technology [Docket No. 653].
12. De Lage Landen Financial Services, Inc. Fifth Third Bank, N.A., and Truist Equipment Finance Corp.'s Supplement to Motions for an Order Granting (I) Relief from the Automatic Stay Pursuant to 11 U.S.C § 362(d) and (II) Related Relief [Docket No. 558].
13. Declaration of Amy Walker in Support of Motion for Relief from the Automatic Stay to Allow TBK Bank, SSB to Exercise its Rights and Remedies with Respect to (A) Equipment Collateral and (B) Real Property Collateral [Docket No. 585].
14. Wallwork Financial Corporation's Notice of Intent to Adduce Testimony from a Remote Location by Telephone and Video Technology [Docket No. 655].
15. Atlantic Union Equipment Finance, Inc.'s Amended Notice of Intent to Adduce Testimony from a Remote Location by Telephone and Video Technology [Docket No. 660].

16. Agreed Order Extending Interim Debtor in Possession Factoring Order and Interim Cash Collateral Order for one Week [Docket No. 646].
17. Western Equipment Finance, a Division of First Western Bank & Trust's Notice of Intent to Adduce Testimony from a Remote Location by Telephone and Video Technology [Docket No. 654].
18. PACCAR Financial Corp.'s Witness & Exhibit List [Docket No. 671].
19. Western Equipment Finance, a Division of First Western Bank & Trust's Witness & Exhibit List [Docket No. 681].
20. First Amended Combined Disclosure Statement and Plan of Liquidation of Kal Freight Inc. and its Affiliated Debtors under Chapter 11 of the Bankruptcy Code [Docket No. 693].
21. [Proposed] Order (I) Granting Interim Approval of the Adequacy of Disclosures in the Combined Plan and Disclosure Statement. (II) Scheduling a Combined Confirmation Hearing and Setting Deadlines Related thereto. (III) Approving Solicitation Packages and Procedures. (IV) Approving the Forms of Ballots. and (V) Granting Related Relief [Docket No. 698].
22. [Proposed] Omnibus Order Granting Relief From The Automatic Stay [Docket No. 701].
23. Wallwork Financial Corporation's Witness & Exhibit List [Docket No. 703].
24. TBK Bank, SSB's Witness & Exhibit List [Docket No. 709].
25. Notice of Filing of Revised Proposed Order Granting Simmons Bank's Motion for Relief From Automatic Stay [Docket No. 710].
26. Atlantic Union Equipment Finance, Inc.'s Witness & Exhibit List [Docket No. 711].
27. Simmons Bank's Witness & Exhibit List [Docket No. 712].
28. Debtors' Witness & Exhibit List [Docket No. 713].
29. Official Committee of Unsecured Creditors' Witness & Exhibit List [Docket No. 714].
30. U.S. Trustee's Witness & Exhibit List [Docket No. 716].
31. U.S. Trustee's Witness & Exhibit List [Docket No. 717].
32. Noor Transport Leasing LLC Witness & Exhibit List [Docket No. 723].
33. Vanguard Trailer Corporation and CIMC Reefer Trailer, Inc.'s Witness & Exhibit List [Docket No. 728].

34. Motion of Vanguard National Trailer Corporation and CIMC Reefer Trailer, Inc. to File Under Seal Certain Confidential Information in the Witness and Exhibit List for Hearing Scheduled for March 12, 2025 at 10:00 a.m. (Prevailing Central Time) [Docket No. 730].
35. Debtors' Notice of Filing Plan Exhibits [Docket No. 732].
36. **Rexford Realty, L.P.'s Witness & Exhibit List [Docket No. 737].**
37. **TBK Bank SSB's Witness & Exhibit List [Docket No. 739].**
38. **RB Realty Investments, LLC's Exhibit List [Docket No. 740].**
39. **Amended [Proposed] Order (I) Granting Interim Approval of the Adequacy of Disclosures in the Combined Plan and Disclosure Statement; (II) Scheduling a Combined Confirmation Hearing and Setting Deadlines Related Thereto; (III) Approving Solicitation Packages and Procedures; (IV) Approving the Forms of Ballots; and (V) Granting Related Relief [Docket No. 745].**
40. **[Proposed] Final Order (A) Providing Adequate Protection to Daimler Truck Financial Services USA Inc., (B) Modifying the Automatic Stay, and (C) Granting Related Relief [Docket No. 747].**
41. **[Proposed] Final Order (A) Providing Adequate Protection to Banc of America Leasing & Capital, LLC, (B) Modifying the Automatic Stay, and (C) Granting Related Relief [Docket No. 748].**
42. **[Proposed] Order (I) Approving Binding Settlement Term Sheet With Participating Lenders and Committee, (II) Authorizing Relief From Automatic Stay and/or Abandonment of Collateral, and (III) Granting Related Relief [Docket No. 749].**
43. **[Proposed] Final Order Authorizing Debtors to (I) Maintain, and Continue to Operate Under Factoring and Security Agreement in Order to Sell Accounts Post-Petition to Triumph Business Capital Pursuant to 11 U.S.C. Section 363(b), (c), (f), and (m); (II) Obtain Credit From Triumph Business Capital Pursuant to 11 U.S.C. Sections 364(c)(1), (c)(2), and (d)(1); (III) Grant Adequate Protection in the Form of First Priority Liens and Security Interests on Property of Debtors' Estates Pursuant to 11 U.S.C. Sections 361 and 363(e); (IV) Amend the Factoring and Security Agreement and Grant Triumph Business Capital Additional Liens; (V) Use Cash Collateral and Grant Triumph Adequate Protection; (VI) Annul and Modify the Automatic Stay; and (VII) Grant Related Relief, All Retroactively to the Petition Date [Docket No. 750].**
44. **[Proposed] Final Order (A) Authorizing the Use of Cash Collateral, (B) Providing Adequate Protection, and (C) Modifying the Automatic Stay [Docket No. 751].**
45. **[Proposed] Order (I) Authorizing (A) the Sale of Certain Assets Free and Clear of Liens, Claims, Rights, Interests, Charges, and Encumbrances, (B) the Debtors**

to Enter Into and Perform Under the APA, and (C) the Assumption and Assignment of Certain Contracts and Unexpired Leases and (II) Granting Related Relief [Docket No. 752].

46. **[Proposed] Omnibus Order Granting Relief From the Automatic Stay [Docket No. 754].**

Dated: March 12, 2025

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Teddy M. Kapur

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Counsel to the Debtors and Debtors in Possession

Certificate of Service

I certify that on March 12, 2025, I caused a copy of the foregoing document to be served via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Teddy M. Kapur

Teddy M. Kapur